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Benefit Profit Sharing Plan, Shelley Saftler,
Corey M. Saftler, Corey M. Saftler CGM IRA
Custodian, Laura Kaplan and Arlene Saftler*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re x
OAK ROCK FINANCIAL, LLC, Chapter 11
Debtor. Case No. 8-13-72251 (DTE)

**NOTICE OF MOTION FOR ENTRY OF ORDER (I) COMPELLING DEBTOR
TO SEGREGATE FUNDS IN CONNECTION WITH PARTICIPATION
INTERESTS IN LOANS, (II) COMPELLING THE DEBTOR TO PROVIDE AN
ACCOUNTING AGING, ALONG WITH OTHER INFORMATION, (III)
AUTHORIZING THE ISSUANCE OF SUBPOENAS FOR THE PRODUCTION
OF DOCUMENTS AND TESTIMONY PURSUANT TO RULE 2004 BY THE
DEBTOR AND (IV) RELATED RELIEF**

(I)

PLEASE TAKE NOTICE that a hearing (the “Hearing”) to consider the motion (the “Motion”) of Eric Rothenberg, Alisse Rothenberg, Eric Jay Rothenberg Rollover IRA, Jeffrey Rapaport, Jeffrey Rapaport M.D. Defined Benefit Profit Sharing Plan, Shelley Saftler, Corey M. Saftler, Corey M. Saftler CGM IRA Custodian, Laura Kaplan and Arlene Saftler (the “Participants”) for entry of an order (I) compelling Oak Rock Financial, LLC (“Oak Rock” or the “Debtor”) to segregate and hold in escrow all funds received or to be received from the Debtor’s borrowers under loans made by the Debtor in which the Participants have a participation interest,

(II) compelling the Debtor to provide the Participants with an accounting and aging reports of all loans made by the Debtor in which the Participants have a participation interest, along with daily reporting of all cash in and out (or access to portals with such information) on such loans, (III) authorizing the issuance by the Participants of Subpoenas pursuant to Bankruptcy Rule 2004 for the production of documents and the examination of the Debtor and its representatives, and (IV) granting related relief, shall be held before the Honorable Dorothy T. Eisenberg, Bankruptcy Judge of the United States Bankruptcy Court for the Eastern District of New York, at the Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722 on **May 13, 2013 at 10:00 a.m.** (prevailing Eastern Time).

Dated: New York, New York
May 8, 2013

KAPLAN & LEVENSON P.C.
Attorneys for Eric Rothenberg, Alisse Rothenberg, Eric Jay Rothenberg Rollover IRA, Jeffrey Rapaport, Jeffrey Rapaport M.D. Defined Benefit Profit Sharing Plan, Shelley Saftler, Corey M. Saftler, Corey M. Saftler CGM IRA Custodian, Laura Kaplan and Arlene Saftler

By: /s/ Steven M. Kaplan
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